



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ENVIRONMENTAL  
CLEANUP

January 23, 2014

Mr. Miles Dyer  
Acting Director, Environmental Compliance  
Senior Staff Environmental Engineer  
Jorgensen Forge Corporation  
8531 E. Marginal Way S  
Tukwila, Washington 98108

Mr. Will Ernst  
EO&T EHS Remediation  
The Boeing Company  
PO Box 3707 M/C 1W-12  
Seattle, Washington 98124

Re: EPA Approval - Steel Sheetpile Design Submittal, Jorgensen Forge  
Outfall Project, Lower Duwamish Waterway Superfund Site, Seattle, WA

Dear Mr. Dyer and Mr. Ernst:

The U.S. Environmental Protection Agency has reviewed the Respondents Design Submittal for the Steel Sheetpile Wall (SSP) Installation and is approving the design submittal in its entirety. The EPAs preferred option for SSP installation is the Cofferdam Design option (Option 1) that would minimize overall water quality effects to the waterway during dredging. EPA expects implementation of this design by the respondents to be completed by the close of the fish window (by March 7, 2014). If Option 1 is implemented, the EPA expects removal of the sheetpile encroaching the waterway prior to the start of tribal fishing in early September. Extensive coordination between the Respondents, the EPA and the tribe will be needed when facilitating the sheetpile removal in the waterway. The EPA also expects the SSP in the shoreline part of the cofferdam to remain in the place to facilitate future upland cleanup. Substantive requirements regarding Clean Water Act Compliance may be needed when implementing Option 1 and EPA will provide the necessary guidance in this regard.

If the Respondents are unable to implement Option 1 by the close of the fish window due to overall timing and Trustee Agency coordination (e.g., tribal consultation, failure to obtain the SSP, contractor procurement issues etc), then the EPA expects the Shoreline Wall SSP Design (Option 2) to be implemented with sufficient time to allow for the EMJ team to implement the sediment dredging by August 1, 2014.

Failure to implement the SSP (either Option 1 or Option 2), which ultimately would result in a delay to the LDW dredging, by EMJ, of the sediments adjacent to the Jorgensen facility will constitute non-compliance by the Respondents with the Second Modification to the Administrative Order on Consent

EMJ013990

for Removal Action for the Jorgensen Forge Outfall Site (JFOS Order), which may subject Respondents to Stipulated Penalties in accordance with the JFOS Order.

Should you have any questions, I can be reached at 206-553-4092 or [sanga.ravi@epa.gov](mailto:sanga.ravi@epa.gov). Inquiries of a legal nature should be directed to Charles Ordine at 206-553-1504 or [ordine.charles@epa.gov](mailto:ordine.charles@epa.gov).

Sincerely,



Ravi Sanga  
Remedial Project Manager  
Site Cleanup Unit 3  
Office of Environmental Cleanup

cc:

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